

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

The State of Texas, et al.,

Plaintiffs,

v.

Google LLC,

Defendants.

Case No. 4:20-cv-00957-SDJ

Hon. Sean D. Jordan

Special Master: David T. Moran

UNOPPOSED MOTION TO FILE UNDER SEAL

Plaintiff States (“States”) respectfully move the Court for leave to file under seal PLAINTIFF STATES’ MOTION TO COMPEL WRITTEN DISCOVERY REGARDING DESTRUCTION OF GOOGLE CHATS and the exhibits thereto, to be filed later today. Defendant Google LLC (“Google”) does not oppose the States’ sealing request.

The States, upon Google’s request and with Google’s consent, request to file under seal their brief and exhibits because: the brief and exhibits reveal individual Google employee names and identities, and the exhibits include transcript excerpts from the depositions of those individual Google employees that reveal their identities and testimony and documents that Google has designated confidential or highly confidential. Google intends to propose publicly available versions of these documents be filed with limited redactions only to protect individual personnel and any highly confidential information. Consistent with Local Rule CV-5, the States will work with Google to file redacted versions—with as limited redactions as possible—of the above-referenced documents within seven (7) days.

For the reasons stated above, the States respectfully request that this Court allow the States to file the above-referenced documents under seal.

Dated: June 26, 2024

Respectfully submitted,

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Submitted on behalf of all Plaintiff States

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CERTIFICATION OF CONFERENCE

I certify that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that Google LLC does not oppose the foregoing sealing request.

/s/ Noah S. Heinz
Noah S. Heinz

CERTIFICATE OF SERVICE

I certify that on June 26, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ Noah S. Heinz
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